

REMARKS

Reconsideration of the Application, as presently amended, is respectfully requested. Claims 1, 20, and 31-32 have been amended. No claims have been added or cancelled. Claims 1-32 are pending.

Claims 1-2, 5, 9-10, 20, and 28 stand rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,852,434 to Sekendur ("Sekendur"). Applicant respectfully submits that Sekendur fails to teach or suggest at least one of the distinguishing features of amended independent claim 1, namely, a separate electronic device for receiving transmitted data and for performing a function of a plurality of functions, the function identified by an area of a pre-defined address pattern that includes a detected portion of the address pattern. Applicant further respectfully submits that Sekendur fails to teach or suggest at least one of the distinguishing features of amended independent claim 20, namely, performing an operation of a plurality of operations using received data, the operation identified by an area that contains at least one detected position.

In contrast to the invention as claimed in amended independent claims 1 and 20, respectively, Sekendur appears to be directed to an apparatus for determining absolute position and movement of a stylus on a surface. A data surface formatted with position-related code for indicating coordinates is used in the position determination. In contrast to amended independent claim 1, Sekendur does not teach or suggest an area of a pre-defined address pattern that identifies a function of a plurality of functions. In contrast to amended independent claim 20, Sekendur does not teach or suggest an operation of a plurality of operations, wherein the operation is identified by an area that contains at least one detected position of an electronic reading device relative to a pre-defined address pattern on a specially-formatted surface.

Applicant respectfully submits that each of amended independent claims 1 and 20 distinguishes over Sekendur. Withdrawal of the rejection of independent claims 1 and 20 as anticipated by Sekendur is respectfully requested.

Dependent claims 2, 5, 9-10, and 28 depend from and further limit independent claims 1 and 20, respectively, in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above relative to independent claims 1 and 20, dependent claims 2, 5, 9-10, and 28 also distinguish over Sekendur. Withdrawal of the rejection of dependent claims 2, 5, 9-10, and 28 as anticipated by Sekendur is respectfully requested.

Claims 1-10, 14-20, and 23-30 stand rejected under 35 U.S.C. 103(a) as being unpatentable over GB 2306669 to Wolff, et al. ("Wolff") in view of Sekendur. Wolff has been cited as teaching all of the features of the rejected claims except for detecting a pre-defined address pattern on a specially-formatted surface. The Office Action asserts that it would have been obvious to one of ordinary skill in the art to substitute Sekendur's optical detector means for Wolff's optical detector means.

Applicant first respectfully submits that there is no motivation to combine Wolff and Sekendur. Wolff is directed to a system for making written entries on a physical document and storing an electronic version of the physical document and any handwritten additions made thereto. Wolff's system utilizes transducers for sensing three-dimensional forces exerted on a writing tip of a pen-like instrument and for sensing motion associated with the act of writing. The pen-like instrument of Wolff is also equipped with a CCD array for reading pre-printed bar codes used for identifying document pages.

Sekendur utilizes a data surface formatted with position-related code for indicating coordinates capable of reflecting a frequency of light. Coordinate information received by a writing element is sent to a computer for processing.

Applicant respectfully submits that, given that the system taught by Wolff utilizes transducers for sensing the three-dimensional forces exerted on a writing tip of the pen-like instrument and motion associated with the act of writing, there would be no motivation to utilize the data surface formatted with position-related code of Sekendur. Wolff teaches the use of bar codes by the pen-like instrument to determine particular pages of a document and that pressure sensors and gyroscopes are used to detect movement of the pen-like instrument on the surface of a document page.

Given the above, Applicant respectfully submits that there is no motivation to combine the teachings of Wolff and Sekendur as suggested by the Office Action. Indeed, even if the teachings of Wolff and Sekendur were somehow combined as suggested by the Office Action, Applicant respectfully submits that the functionality of Wolff would be impaired, since the paper used in the combined system would be by necessity formatted with position-related code.

Moreover, even if it is assumed, for the sake of argument, that Sekendur and Wolff may somehow properly be combined, the cited combination of Wolff and Sekendur fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 1, namely, a separate electronic device for receiving the transmitted data and for performing a function of a plurality of functions, the function identified by an area of a pre-defined address pattern that includes a detected portion of the address pattern. The cited combination of Wolff and Sekendur similarly fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 20, namely, performing an operation of a plurality of operations using received data, the operation identified by an area that contains at least one detected position. Neither Wolff nor Sekendur teaches the above-listed distinguishing features of independent claims 1 and 20, respectively.

Applicant respectfully submits that independent claims 1 and 20 each distinguish over the cited combination of Wolff and Sekendur. Applicant respectfully requests that the rejection of independent claims 1 and 20 as unpatentable over Wolff in view of Sekendur be withdrawn.

Dependent claims 9-10, 14-19, and 23-30 depend from and further limit independent claims 1 and 20, respectively. Applicant respectfully submits that each of dependent claims 2-10, 14-19, and 23-30 distinguishes over the cited combination of references for at least the same reasons as those set forth above with respect to independent claims 1 and 20, respectively. Withdrawal of the rejection of dependent claims 2-10, 14-19, and 23-30 as unpatentable over Wolff in view of Sekendur is respectfully requested.

Claims 11-13, 21-22, and 31-32 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Wolff in view of Sekendur as applied to claims 1-10, 14-20, and 23-30, and further in view of U.S. Patent No. 6,577,299 to Schiller, et al. ("Schiller"). Schiller has been cited as disclosing a mobile phone for receiving, executing, and faxing data information.

With respect to the rejection of claims 11-13 and 21-22, Applicant respectfully submits that Schiller fails to supply the deficiencies noted above of the cited combination of Wolff and Sekendur. Applicant respectfully submits that claims 11-13 and 21-22 distinguish over the cited combination of Wolff in view of Sekendur and in further view of Schiller. Withdrawal of the rejection of dependent claims 11-13 and 21-22 as unpatentable over the combination of Wolff and Sekendur and Schiller is respectfully requested.

With respect to the rejection of claims 31-32, Applicant respectfully submits that the cited combination of Wolff, Sekendur, and Schiller fails to teach, suggest or render obvious at least one of the distinguishing features of amended independent claim 31, namely, wherein an area of the pre-defined address pattern including the detected portion identifies a function of a plurality of functions of a mobile phone and wherein a user of a mobile phone can utilize relayed

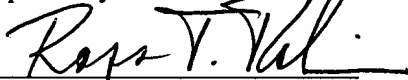
information to execute the identified function within the mobile phone. The cited combination of Wolff, Sekendur, and Schiller also fails to teach, suggest, or render obvious at least one of the distinguishing features of amended independent claim 32, namely, wherein an area of the pre-defined address pattern including the detected portion identifies a function of a plurality of functions of a mobile phone and utilizing relayed information to execute the identified function within the mobile phone.

Applicant respectfully submits that independent claims 31-32 distinguish over the cited combination of Wolff, Sekendur, and Schiller. Withdrawal of the rejection of independent claims 31-32 as unpatentable over the cited combination of Wolff, Sekendur, and Schiller is respectfully requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

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Respectfully submitted,

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